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Presentment Date and Time: April 28, 2017 at 4:00 p.m.

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Counsel to the Plan Administrator *for the Debtors*

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re Chapter 11

Gawker Media LLC, et al., 1 Case No. 16-11700 (SMB)

> Debtors. (Jointly Administered)

NOTICE OF PRESENTMENT OF PROPOSED ORDER GRANTING DEBTORS' **OBJECTION TO THE CLAIMS OF ALADAR BALDAUF (CLAIM NOS. 326 AND 332)**

PLEASE TAKE NOTICE that on February 6, 2017, the above-captioned debtors (the "Debtors") filed the Debtors' Objection to the Claims of Aladar Baldauf (Claim Nos. 326 and 332) [Docket No. 732] (the "Objection"), with a proposed order attached as Exhibit A to the Objection. The response deadline in respect of the relief sought in the Objection was on February 28, 2017, pursuant to the Notice of Debtors' Objection to the Claims of Aladar Baldaduf (Claim Nos. 326 and 332) [Docket No. 723].

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¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Kinja Kft. (5056). Gawker Media LLC and Gawker Media Group, Inc.'s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Kinja Kft.'s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

PLEASE TAKE FURTHER NOTICE that on April 14, 2017, counsel to the Plan Administrator for the Debtors filed the *Declaration of Gregg M. Galardi Submitting Certain Documentation Received from Aladar Baldauf* [Docket No. 859].

PLEASE TAKE FURTHER NOTICE that on April 18, 2017, a hearing on the Objection (the "<u>Hearing</u>") was held before the Honorable Stuart M. Bernstein of the United States Bankruptcy Court for the Southern District of New York (the "<u>Court</u>").

PLEASE TAKE FURTHER NOTICE that at the Hearing, the Court stated that it would enter the proposed order and directed the Debtors to submit the proposed order on 10 days' notice.

PLEASE TAKE FURTHER NOTICE that attached hereto as <u>Exhibit A</u> is the proposed order (the "<u>Proposed Order</u>").

PLEASE TAKE FURTHER NOTICE that attached hereto as <u>Exhibit B</u> is a blackline of the Proposed Order against the proposed order submitted with the Objection.

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PLEASE TAKE FURTHER NOTICE that the Debtors will present to the Court the

Proposed Order for signature on April 28, 2017 at 4:00 p.m.

Dated: April 18, 2017 New York, New York /s/ Gregg M. Galardi
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